

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA,

v.

PERRY “PJ” MATLOCK (2),

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§

Case No. 4:22-CR-612

**AGREED MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL FOR  
DEFENDANT PERRY “PJ” MATLOCK**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Charles Flood and respectfully moves to withdraw as counsel of record for Defendant Perry “PJ” Matlock, in the above-entitled and numbered cause of action. In his place will be substituted:

Luis A. Reyes (lead counsel)  
Texas Bar No. 90001831  
lreyes@ashcroftlawfirm.com

Johnny Sutton  
Texas Bar No. 19534250  
jsutton@ashcroftlawfirm.com

Christopher L. Peele  
Texas Bar No. 24013308  
cpeele@ashcroftlawfirm.com

ASHCROFT SUTTON REYES LLC  
919 Congress Ave., Suite 1325  
Austin, Texas 78701  
512-370-1800

Subject to this motion, a Notice of Appearance has already been filed on behalf of Luis Reyes, Johnny Sutton, and Chris Peele. Defendant Perry “PJ” Matlock approves of the substitution. This withdrawal is not sought for purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Defendant Perry “PJ” Matlock respectfully requests that this Court grant this Motion to Withdraw and Substitute Counsel.

Respectfully submitted,

**FLOOD & FLOOD**

/s/ Charles Flood (by C. Peele with permission)

Charles Flood  
State Bar No. 00798178  
914 Preston Street, Ste. 800  
Houston, TX 77002  
Telephone: 713-223-8877  
charles@floodandflood.com

**ASHCROFT SUTTON & REYES, LLC**

/s/Christopher L. Peele

Johnny Sutton  
jsutton@ashcroftlawfirm.com  
Texas Bar No. 19534250  
Luis A. Reyes  
lreyes@ashcroftlawfirm.com  
Texas Bar No. 90001831  
Christopher L. Peele  
cpeele@ashcroftlawfirm.com  
Texas Bar No. 24013308  
Ashcroft Sutton Reyes, LLC  
919 Congress Ave., Ste. 1325  
Austin, TX 78701  
Phone: (512) 370-1800  
Facsimile: (512) 397-3290

ATTORNEYS FOR DEFENDANT  
PERRY “PJ” MATLOCK

**CERTIFICATE OF SERVICE**

I hereby certify that on this, the 21st day of December 2022, copies of the foregoing were served on all registered parties via email and CM/ECF, concurrent with the filing of the same.

*s/Christopher L. Peele* \_\_\_\_\_

Christopher L. Peele

ATTORNEY FOR DEFENDANT  
PERRY "PJ" MATLOCK